

To: Federal Communications Commission
Re: Comments opposing granting Sandwich Isles Communications
a "study area waiver" : **CC Docket No. 96-45**

I urge you to decline granting Sandwich Isles Communications a study area waiver to qualify for Universal Service Fund support. Why I feel this way is SIC won't be serving just undeserved areas here in Hawaii. USDA RUS loans cannot be used in areas with a population of 5,000 or more people. When I spoke to USDA RUS the person I spoke to admitted to me that SIC will be serving some urban areas as far as I understood. The reason why this is important is because it shows that SIC won't be just serving undeserved areas.

On top of this there is a overlap of service with Verizon, the incumbent local exchange carrier for Hawai. From the FCC TAPD order # **FCC 04-256** :

" Verizon Hawaii indicates that some proposed areas were "located in the center of the city of Honolulu and – far from being "unserved" – are served by some of the largest central offices in the state of Hawaii." See Application for Review at 9; see also Opposition to Petition at 7. Although Verizon Hawaii acknowledges that some proposed areas did not have telephone service, it states that these were planned Hawaiian Home Lands subdivisions that had not yet been built and were adjacent to subdivisions served by GTE. See Application for Review at 7 ("GTE Hawaiian Tel is presently providing service to subdivisions directly and immediately adjacent to those identified by [Sandwich Isles], and has every intention of providing service to the new subdivisions as well.").

I concur with Verizon with the above statement that some of SIC's service area is certainly far from being undeserved. Certainly this is the case being since some of SIC's service area includes the heart of Honolulu.

Thank you for reading my comments,

Sincerely,
Aaron Stene